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Attorneys for Third-Party Plaintiff
GLASFORMS, INC., a California corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DONG AH TIRE & RUBBER CO., LTD.,
a Korean Corporation,

Plaintiff,

v.

GLASFORMS, INC., a California
corporation,

Defendant/Third-Party
Plaintiff.

v.

CTG INTERNATIONAL (NORTH
AMERICA) INC., an Indiana Corporation;
TAISHAN FIBERGLASS, INC., a
corporation organized under the laws of the
People's Republic of China,

Third-Party Defendants.

CASE NO. C 06-03359 JF
(Consolidated With Case No. C 06-00213 JF)

**STIPULATION SETTING SECOND
AMENDED PRETRIAL SCHEDULE AND
[PROPOSED] ORDER THEREON**

1 This stipulation is entered into between third-party plaintiff Glasforms, Inc.
2 (“Glasforms”), third-party defendant CTG International (North America) Inc. (“CTG”), and third-
3 party defendant Taishan Fiberglass, Inc. (“Taishan”), by and through their respective counsel of
4 record.

5 **RECITALS**

6 WHEREAS, by stipulation and order of the Court dated December 20, 2007 (Document
7 45), the current fact discovery cut-off in these consolidated cases is February 29, 2008;

8 WHEREAS Glasforms and Plaintiff Dong Ah Tire & Rubber, Co. Ltd. (“Dong Ah”) have
9 reached a settlement of Dong Ah’s claims against Glasforms and, therefore, Dong Ah is not a
10 necessary signatory to this stipulation;

11 WHEREAS some additional documents remain to be produced and several depositions
12 remain to be taken and completed in this case, including the completion of depositions of
13 Glasforms personnel, the deposition of a CTG employee who is expected to return to California
14 from China in mid-March 2008, and a Taishan employee who will travel to California for
15 deposition in late February 2008;

16 WHEREAS the parties anticipate needing until April 30, 2008 to complete the above-
17 referenced discovery;

18 WHEREAS, so that the parties may complete pending fact discovery in this case,
19 including the above-referenced depositions, prior to proceeding to expert disclosures and other
20 pre-trial matters, Glasforms, CTG, and Taishan have agreed to enter into this stipulation to further
21 extend the fact discovery cut-off and the remaining pre-trial deadlines approximately two (2)
22 months as described below;

23 WHEREAS, with respect to the subject of potential new discovery requests not already
24 propounded and necessitated by newly discovered information, the parties agree that they shall
25 each have the same rights going forward that they would otherwise have had if the fact discovery
26 period ended on the original cut-off date in this case of December 15, 2007 (i.e., by entering into
27 this Stipulation, no party hereto waives any rights they may have to propound such additional
28 discovery pursuant to the agreement of the parties or Court order for good cause);

1 NOW, THEREFORE IT IS HEREBY AGREED AND STIPULATED by and between
2 Glasforms, CTG, and Taishan, by and through their respective counsel of record, and subject to
3 Court approval, that the Pretrial Schedule previously approved by the Court should be amended
4 again and that the trial date and pretrial deadlines be re-set as follows:

5 **Event**

Date Set

6 Cut-Off For Already Pending Fact Discovery	April 30, 2008
7 Exchange Expert Disclosures/Reports	May 5, 2008
8 Last Day to File Dispositive Motions	May 19, 2008
9 Exchange Rebuttal Expert Disclosures/Reports	June 6, 2008
10 Expert Discovery Cut-Off	July 3, 2008
11 Final Witness Lists	July 3, 2008
12 Motions in Limine	July 21, 2008
13 Oppositions to Motions in Limine and Trial Briefs	August 4, 2008
14 Pretrial Conference	August 29, 2008
15 Jury Trial (2 week estimate)	September 8, 2008

16 IT IS RESPECTFULLY REQUESTED that the Court issue a Second Amended Pretrial
17 Scheduling Order conforming to the schedule set forth above based upon this Stipulation of the
18 parties.

19 IT IS SO STIPULATED:

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1 Dated: February 14, 2008

HOPKINS & CARLEY
A Law Corporation

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4 By: _____/s/
Robert A. Christopher
Tod C. Gurney
Attorneys for Defendant/Third-Party
Plaintiff GLASFORMS, INC.

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6 Dated: February 14, 2008

CAMPBELL, Warburton,
Fitzsimmons, Smith, Mendell
& Pastore

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10 By: _____/s/
J. Michael Fitzsimmons
Lisa Jeong Cummins
Attorneys for Third Party Defendant
CTG INTERNATIONAL (NORTH
AMERICA) INC.

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12
13 Dated: February 14, 2008

BAKER & DANIELS, LLP

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15 By: _____/s/
David K. Herzog
April E. Sellers
Attorneys for Third-Party Defendant
TAISHAN FIBERGLASS, INC.

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18 IT IS SO ORDERED:

19 Dated: 2/22/08, ~~XXXX~~ 2008

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HONORABLE JEREMY FOGEL

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PURSUANT TO GENERAL ORDER NO. 45,

I, Tod C. Gurney, the ECF User transmitting and filing this Stipulation Setting Second Amended Pretrial Schedule and [Proposed] Order Thereon, attest that I have obtained the concurrence of April Sellers, and Lisa Cummins on this filing.

I declare the foregoing under the penalty of perjury.

Dated: February 14, 2008

HOPKINS & CARLEY
A Law Corporation

By: _____/s/
Tod C. Gurney
Attorneys for Third-Party Plaintiff,
GLASFORMS, INC.